

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ARLENE J. DELGADO,

Plaintiff,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,  
*et al.*,

Defendants.

Case No. 19-cv-11764 (AT) (KHP)

**DECLARATION OF REINCE PRIEBUS**

REINCE PREIBUS, pursuant to 28 U.S.C. § 1746, declares and says as follows:

1. I am the former White House Chief of Staff under President Donald J. Trump and am an individually named defendant in the above captioned case. I submit this declaration in support of Defendants' opposition to Plaintiff's Cross-Motion for Partial Summary Judgment ("Plaintiff's Motion").

2. Plaintiff claims that Katie Walsh was my proxy in order to argue that I somehow must have had a role in the decision to deny Plaintiff a position in the White House. This is simply incorrect.

3. Katie Walsh and I worked together while we were both with Republican National Committee.

4. After President Trump won the 2016 election, Ms. Walsh volunteered for the Presidential Transition Committee, Trump for America, Inc. ("TFA").

5. As part of the TFA, Ms. Walsh reported to a number of different individuals and coordinated many of the logistics for the TFA.

6. Ms. Walsh and I never discussed Ms. Delgado in any manner, and we never spoke about Ms. Delgado's potential hire for a White House position.

7. Indeed, as I have previously explained, I had no role in determining whether Ms. Delgado was hired for a position in the White House.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: Feb 13, 2025

  
Reince Priebus